

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MASSACHUSETTS**

CIVIL ACTION No.: 04-11625 RWZ

JOAN CHARLES,
Plaintiff,

v.

**OCWEN FEDERAL BANK, OCWEN FINANCIAL
CORPORATION, MASSACHUSETTS PROPERTY
INSURANCE UNDERWRITING ASSOCIATION
and ONE CALL INSURANCE AGENCY, INC.,**
Defendants,

**ANSWER OF DEFENDANT MASSACHUSETTS
PROPERTY INSURANCE UNDERWRITING ASSOCIATION TO
CROSSCLAIM OF OCWEN FEDERAL BANK AND
OCWEN FINANCIAL CORPORATION AND
CROSS – CLAIM OF MASSACHUSETTS PROPERTY
INSURANCE UNDERWRITING ASSOCIATION**

ANSWER TO CROSSCLAIM OF OCWEN FEDERAL BANK

1. Defendant can neither admit nor deny and therefore denies and calls upon Plaintiff to prove the same.
2. Admit.
3. Defendant can neither admit nor deny and therefore denies and calls upon Plaintiff to prove the same.
4. Defendant repeats answers to paragraphs 1 through 3.
5. Deny.
6. Defendant repeats answers to paragraphs 1 through 5.
7. Deny.

**CROSS – CLAIM OF MASSACHUSETTS PROPERTY INSURANCE UNDERWRITING
ASSOCIATION AGAINST OCWEN FEDERAL BANK, F.S.B., OCWEN FINANCIAL
CORPORATION AND ONCE CALL INSURANCE AGENCY, INC.**

1. The Defendant/Plaintiff-in-Cross – Claim Massachusetts Property Insurance Underwriting Association (hereinafter “MPIUA”) is an association with an

principle place of business located at 2 Center Plaza, 8th floor, Boston, MA 02108.

2. The Co-Defendant/Defendant in Cross – Claim Ocwen Federal Bank, FSB and Ocwen Financial Corporation (hereinafter together “Ocwen”) are entities with an address at 1675 Palm Beach Lakes Blvd., West Palm Beach, FL.
3. The Co- Defendant/Defendant in Cross – Claim Once Call Insurance (hereinafter “One Call”) is a corporation with a principle place of business located at 121B Tremont Street, Suite 25, Brighton, MA.
4. MPIUA specifically denies that it is liable to the Plaintiff in Complaint. However, if MPIUA is found liable to the Plaintiff in Complaint, then Ocwen is a joint tortfeasor, such that Ocwen is liable for their contribution share of liability to the Plaintiff in Complaint, in accordance with M. G. L. c. 231B §1 et seq.
5. MPIUA repeats and incorporates by reference paragraphs 1 through 5 above, as if set forth fully herein.
6. MPIUA specifically denies that it is liable to the Plaintiff in Complaint. However, if MPIUA is found liable to the Plaintiff in Complaint, then One Call is a joint tortfeasor, such that One Call is liable for their contribution share of liability to the Plaintiff in Complaint, in accordance with M. G. L. c. 231B §1 et seq.

WHEREFORE, MPIUA respectfully requests that judgment enter in its favor on its Cross – Claim against Ocwen and One Call, including interest, costs and attorney’s fees.

Respectfully submitted,
By my attorney,

/s/ Michael W. Reilly, Esq.

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